United States of America

## UNITED STATES DISTRICT COURT

for the
WESTERN District of TEXAS

)

V.  Tony Evans  a/k/a Tony Tre Von Evans,  a/k/a Tony Trevon Evans  Defendant(s)			) Case No. SA-22-MJ-00683 ) ) )
		CRIMINAL (	COMPLAINT
I. the c	complainant in this cas		g is true to the best of my knowledge and belief.
	•		$\frac{1}{1}$ in the county of $\frac{1}{1}$ Bexar in the
Western	District of Texa		defendant(s) violated:
Code Section			Offense Description
Title 18, USC, Section 2114(a)		Robbery of Mail, M	oney, or Property of the U.S.
			10 years Imprisonment, \$250,000 Fine, 3 Years and \$100 Mandatory Special Assessment.
This c	riminal complaint is ba	ased on these facts:	
See attached a	affidavit		
■ Co	ontinued on the attache	ed sheet.	Marcus Daly Digitally signed by Marcus Daly Date: 2022.05.05 16:59:27
			Complainant's signature
			Marcus Daly, U.S. Postal Inspector
Sworn to before me and signed in my presence.  Sworn to telephonically and signed electronically.  Date: 05/06/2022			Printed name and title  11111111111111111111111111111111111
City and state: San Antonio, Texas			Judge's signature  Richard B. Farrer, U.S. Magistrate Judge  Printed name and title

## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

SA-22-MJ-00683

## AFFIDAVIT IN SUPPORT OF COMPLAINT AND ARREST WARRANT

- I, Marcus Daly, being first duly sworn, hereby depose and state as follows:
  - 1. I am a Postal Inspector with the U.S. Postal Inspection Service (USPIS), currently assigned to the Houston Division and domiciled in San Antonio, Texas. I have been a Postal Inspector for 16 years. As part of my duties, I investigate violent crimes (Robberies, Assaults, and Homicides) against Postal employees and/or crimes occurring on Postal property. Furthermore, I have been trained in various aspects of law enforcement, including the investigation of workplace violence and assault-related offenses. Through my education, training, and experience, I have become familiar with the methods that individuals use to communicate with other individuals prior, during, and/or after a crime has occurred.
  - 2. I present this affidavit in support of a criminal complaint and arrest warrant for **TONY EVANS**, a/k/a **Tony Tre Von Evans**, a/k/a **Tony Trevon Evans**. Since March 2021, USPIS has been investigating a string of robberies of U.S. postal workers in San Antonio, Texas, and the Western District of Texas. Based on this investigation, there is probable cause to believe that **EVANS** committed Robbery of Mail, Money, or Property of the U.S., in violation of Title 18, United States Code, Section 2114(a) on July 27, 2021, August 25, 2021, and April 19, 2022.
  - 3. On July 27, 2021, an individual confronted a USPS letter carrier who was delivering U.S. mail at The Boulevard at Medical Center Apartments located on USAA Boulevard in San Antonio, Texas 78240. The individual confronted the carrier and forcibly grabbed and ripped the carrier's keychain from the carrier's belt loop. The individual then ran inside the gated apartment complex. The individual was described as an African American male wearing dark-colored clothing, a dark-colored hoodie, and dark-colored shoes. Your affiant reviewed the video footage captured by the apartment complex's security camera, which showed the robber arriving and departing in a dark-colored vehicle resembling a 2015 or newer Chrysler 200 sedan.
  - 4. On August 25, 2021, an individual confronted a USPS letter carrier who was delivering U.S. mail at The Estates at San Antonio Apartments located on W. Hausman Road, San Antonio, Texas 78249. The subject brandished a firearm and demanded the carrier's postal keys. The subject was described as an African American male wearing a gray hoodie, a face mask, and red-colored slides. Your affiant reviewed the August 25th video footage captured by the apartment complex's security camera both prior to and following the robbery, and found the subject arriving and departing in a dark-colored Audi A4 bearing specific Texas license plates. Through my investigation, I determined that **TONY EVANS** was in telephonic contact with the owner of this Audi A4, approximately 18 minutes after the August 25th incident.

- 5. Further investigation showed an address for **EVANS** at the 6300 block of Attucks Lane, San Antonio, Texas 78238 and two associated vehicles: a gray-colored 2015 Chrysler 200 and a white-colored 2018 Maserati Ghibli, both bearing Texas license plates. Your affiant reviewed photographs of **EVANS**' Chrysler 200 and determined his vehicle remarkably resembled the dark-colored vehicle used in the July 27th robbery.
- 6. Through a federal search warrant, your affiant obtained location data records from T-Mobile, USA for **EVANS**' phone number and learned that **EVANS**' phone was in the vicinity of the July 27th and August 25th robberies described above.
- 7. Your affiant's investigation also identified **EVANS**' Chrysler 200 sedan parked at the Oxford at Medical Center Apartment, located on Fairhaven Street, San Antonio, Texas 78229, on various dates. Your affiant learned this address to be associated with **EVANS**' girlfriend, G.M. On November 8, 2021, **EVANS**' Chrysler 200 was seen at these apartments on the same day the apartment complex reported mail theft activity. Your affiant reviewed video footage captured by the apartment complex's security camera and saw a male and female enter the mail room between approximately 1:58 A.M. and 2:01 A.M. Video footage showed the male using what appeared to be a postal key to easily access various mailbox panels and gain access to numerous individual mailbox units. On the same day, your affiant conducted surveillance at the Oxford at Medical Center Apartments and observed **EVANS** at the complex.
- 8. On April 19, 2022, an individual confronted a USPS letter carrier who was delivering U.S. mail at the Canvas Apartments located on West William Cannon Drive, Austin, Texas 78745. The subject brandished a firearm and demanded the carrier's postal keys. The subject was described as an African American male wearing a red-colored hoodie and face mask.
- 9. Your affiant reviewed the April 19th video footage captured by the apartment complex's security camera, and observed a white-colored vehicle resembling EVANS' Maserati drive into camera view and make a turn in the parking lot. A subject is seen entering camera view from the last location of the white-colored vehicle and walking toward the apartment mail room area. The subject was wearing a red-colored hoodie that closely resembled a hoodie your affiant has seen worn by EVANS on multiple prior occasions. A witness reported seeing the subject entering a white-colored sedan driven by a Hispanic female.
- 10. The next day, April 20, 2022, your affiant conducted drive-by surveillance of **EVANS**' residence on Attucks Lane in San Antonio, Texas, and saw **EVANS**' white-colored Maserati, his gray-colored Chrysler 200, and G.M.'s blue-colored Dodge Charger.
- 11. Through a court order, your affiant obtained cell tower records from T-Mobile, USA and learned that **EVANS**' phone was also in the vicinity of the Canvas Apartments on West William Cannon Drive, Austin, TX 78745 around the time of the April 19th robbery.
- 12. In sum, EVANS' cell phone was in the vicinity of all three postal worker robberies

described above, in San Antonio and Austin. These robberies occurred at three distinct geographic locations, and EVANS' phone was in the vicinity each time. Review of surveillance footage from these incidents also shows that on both July 27, 2021, and April 19, 2022, the robber used a vehicle closely resembling vehicles associated with EVANS. EVANS and his vehicle were also surveilled at a San Antonio apartment complex the same day someone used a mail key to illegally access complex mailboxes—the same type of mail key stolen in the robberies detailed in this affidavit. Finally, your affiant has discovered that the clothing worn by the robber on April 19, 2022, closely resembles clothing previously seen on EVANS over the course of the investigation.

13. Based on the aforementioned, there is probable cause to believe that **TONY EVANS**, a/k/a **Tony Tre Von Evans**, a/k/a **Tony Trevon Evans**, in the Western District of Texas, committed the offense of Robbery of Mail, Money, or Property of the U.S., in violation of Title 18 United States Code, Section 2114(a), on July 27, 2021, August 25, 2021, and April 19, 2022.

Marcus Daly Digitally signed by Marcus Daly Date: 2022.05.05 17:01:00 -05'00'

MARCUS S. DALY U.S. Postal Inspector, Federal Agent

SUBSCRIBED and SWORN to telephonically

0<u>5/06</u>/2022

HONORABLE RICHARD B. FARRER UNITED STATES MAGISTRATE JUDGE